

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERNESTO SALVADOR FLORES,  
aka "Neto,"  
aka "Lil Neto,"  
aka "Klepto,"  
aka "Frosty,"

Defendant.

CR No. 2:25-CR-00062-MRA

I N D I C T M E N T

[18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm and Ammunition; 18 U.S.C. § 924 and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

[18 U.S.C. § 922(g)(1)]

On or about November 3, 2024, in Ventura County, within the Central District of California, defendant ERNESTO SALVADOR FLORES, also known as ("aka") "Neto," aka "Lil Neto," aka "Klepto," aka "Frosty," knowingly possessed a firearm, namely, a Canik, model TP9SF, 9mm caliber pistol, bearing serial number 21BH30635, and ammunition, namely, four rounds of Winchester 9mm Luger caliber ammunition, each in and affecting interstate and foreign commerce.

1 Defendant FLORES possessed such firearm and ammunition knowing  
2 that he had previously been convicted of at least one of the  
3 following felony crimes, each punishable by a term of imprisonment  
4 exceeding one year:

5 1. Street Terrorism, in violation of California Penal Code  
6 Section 186.22(a), in the Superior Court for the State of California,  
7 County of Ventura, Case Number 2011043279, on or about April 9, 2012;

8 2. Resisting an Executive Officer, in violation of California  
9 Penal Code Section 69, in the Superior Court for the State of  
10 California, County of Ventura, Case Number 2011043279, on or about  
11 April 9, 2012;

12 3. Vandalism, in violation of California Penal Code Section  
13 594(b)(1), in the Superior Court for the State of California, County  
14 of Ventura, Case Number 2017011032, on or about May 8, 2019;

15 4. Shooting at an Unoccupied Vehicle, in violation of  
16 California Penal Code Section 247(b), in the Superior Court for the  
17 State of California, County of Ventura, Case Number 2017011032, on or  
18 about May 8, 2019;

19 5. Discharge of Firearm with Gross Negligence, in violation of  
20 California Penal Code Section 246.3(a), in the Superior Court for the  
21 State of California, County of Ventura, Case Number 2017011032, on or  
22 about May 8, 2019;

23 6. Possession of a Firearm by a Felon, in violation of  
24 California Penal Code Section 29800(a)(1), in the Superior Court for  
25 the State of California, County of Ventura, Case Number 2017011032,  
26 on or about May 8, 2019;

27 7. Possession for Sale of a Controlled Substance, in violation  
28 of California Health and Safety Code Section 11378, in the Superior

1 Court for the State of California, County of Ventura, Case Number  
2 2017011032, on or about May 8, 2019;

3 8. Possession Of a Controlled Substance with Firearm, in  
4 violation of California Health and Safety Code Section 11370.1(a), in  
5 the Superior Court for the State of California, County of Ventura,  
6 Case Number 2017011032, on or about May 8, 2019;

7 9. Carry a Concealed Firearm Upon a Person, in violation of  
8 California Penal Code Section 25400(a)(2), in the Superior Court for  
9 the State of California, County of Ventura, Case Number 2017011032,  
10 on or about May 8, 2019;

11 10. Possession of a Firearm by a Felon, in violation of  
12 California Penal Code Section 29800(a)(1), in the Superior Court for  
13 the State of California, County of Ventura, Case Number 2017011032,  
14 on or about May 8, 2019;

15 11. Possession for Sale of a Controlled Substance, in violation  
16 of California Health and Safety Code Section 11378, in the Superior  
17 Court for the State of California, County of Santa Barbara, Case  
18 Number 17CR03814, on or about November 9, 2021; and

19 12. Assault with a Deadly Weapon with Force, in violation of  
20 California Penal Code Section 245(a)(4), in the Superior Court for  
21 the State of California, County of Santa Barbara, Case Number  
22 20CR08574, on or about November 9, 2021.

FORFEITURE ALLEGATION

[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), in the event of defendant's conviction of the offense set forth in this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any firearm or ammunition involved in or used in such offense.

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof

(a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been


1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.

3  
4 A TRUE BILL

5  
6 /s/  
7 Foreperson

8 JOSEPH T. MCNALLY  
9 Acting United States Attorney

10 LINDSEY GREER DOTSON  
11 Assistant United States Attorney  
12 Chief, Criminal Division

13   
14 FRANCES S. LEWIS  
15 Assistant United States Attorney  
16 Chief, General Crimes Section

17 BENEDETTO L. BALDING  
18 Assistant United States Attorney  
19 Deputy Chief, General Crimes  
20 Section

21 ALEXANDER H. TRAN  
22 Assistant United States Attorney  
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